

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of

Advanced Television Systems  
And Their Impact upon the  
Existing Television Broadcast  
Service

To: The Commission

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MB Docket No. 87-268

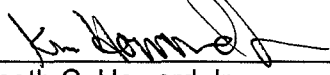
**COMMENTS**

Tanana Valley Television Company, licensee of Station KFXF-DT ("TVTV"), which currently operates on digital channel 22 at Fairbanks, Alaska (Facility ID 64597), respectfully files these Comments in response to the Seventh Further Notice of Proposed Rule Making, *Advanced Television Systems and Their Impact upon the Existing Television Broadcast Service* ("FNPRM"), issued by the Commission in the above-captioned matter on October 20, 2006 (FCC 06-150).

TVTV submits the attached technical exhibit in support of its request that its digital allotment facility be changed to its "replication" facility allotment.

Respectfully submitted,

Tanana Valley Television Company

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January 25, 2007

Its Attorneys

TECHNICAL EXHIBIT  
SUPPORTING THE COMMENTS OF  
TANANA VALLEY TELEVISION COMPANY  
STATION KFXF-DT (FACILITY ID 64597)  
FAIRBANKS, ALASKA  
CHANNEL 7

Technical Narrative

This Technical Exhibit supports the comments of Tanana Valley Television Company, licensee of station KFXF-DT, which currently operates on digital channel 22 at Fairbanks, Alaska (Facility ID 64597). These comments address the Federal Communications Commission (FCC) Seventh Further Notice of Proposed Rule Making (“7<sup>th</sup> FNPRM”) in MB Docket No. 87-268.

The proposed post-transition digital allotment for KFXF-DT specified in the FCC’s 7<sup>th</sup> FNPRM is based on the original facility certification and channel election for KFXF-DT established in the post transition digital channel election process. The proposed allotment for KFXF-DT in the 7<sup>th</sup> FNPRM specifies operation on channel 7 with a maximum ERP of 3.2 kW using antenna pattern ID 74449. See attached Figure 1. The transmitter site is specified with coordinates of 64-55-20 N.L. / 147-42-55 W.L. with an antenna HAAT of 214 m. This facility specification is based on the original channel 22 construction permit for KFXF-DT, FCC File No. BPCDT-19991012ABC. Construction of the KFXF-DT facility was completed in the summer of 2004, and an application for license is pending to cover the construction permit. See FCC File No. BLCDDT-20040802AQU.

However, KFXF-DT plans to build its final post transition digital facility on its existing tower using its present analog directional antenna, which is a Scala model CA2-8, FCC Antenna ID 22631. See attached Figure 2. This antenna is located on the same tower as the KFXF-DT channel 22 facility, but it has a radiation center HAAT of 268 m (512 m

AMSL). It is now clear that with the operation of KFXF-DT on channel 7 with its licensed analog antenna pattern it will not be possible to match the DTV allotment facility for KFXF-DT, which was based on the KFXF-DT channel 22 construction permit facility.

Therefore, Tanana Valley Television Company hereby requests that its digital allotment facility be changed to its "replication" facility allotment, with a maximum ERP of 3.2 kW using the KFXF-DT licensed analog antenna pattern envelope. The specifications for the requested digital allotment for KFXF-DT are summarized as follows:

| Proposed DTV Table of Allotments Information for KFXF-DT |  |
|--|--|
| Parameter  | Specification                              |
| Facility ID  | 64597                                      |
| State and City   | AK, Fairbanks                              |
| NTSC Channel   | 7  |
| DTV Channel  | 7  |
| ERP (kW)   | 3.2  |
| HAAT (m)   | <u>268</u> (Radiation Center = 512 m AMSL) |
| Antenna ID   | <u>22631</u> (See attached Figure 2.)      |
| Latitude   | 645520                                     |
| Longitude  | 1474255                                    |

Interference calculations for the above proposed KFXF-DT allotment have been made using the procedures outlined in the FCC's the OET-69 Bulletin. A 2-kilometer grid, a 1-kilometer terrain increment, and the 2000 Census have been employed. The following lists the assignments requiring consideration and the amount of new interference caused by the proposed KFXF-DT allotment on channel 7 as described above.

|   |                          |
|---|--------------------------|
| Post-Transition DTV Allotment Facility  | New KFXF-DT interference |
| No affected allotments or assignments within the required distance search ranges. |                          |

Based on the foregoing, the FCC is respectfully requested to change the KFXF-DT specified allotment facility as described herein.

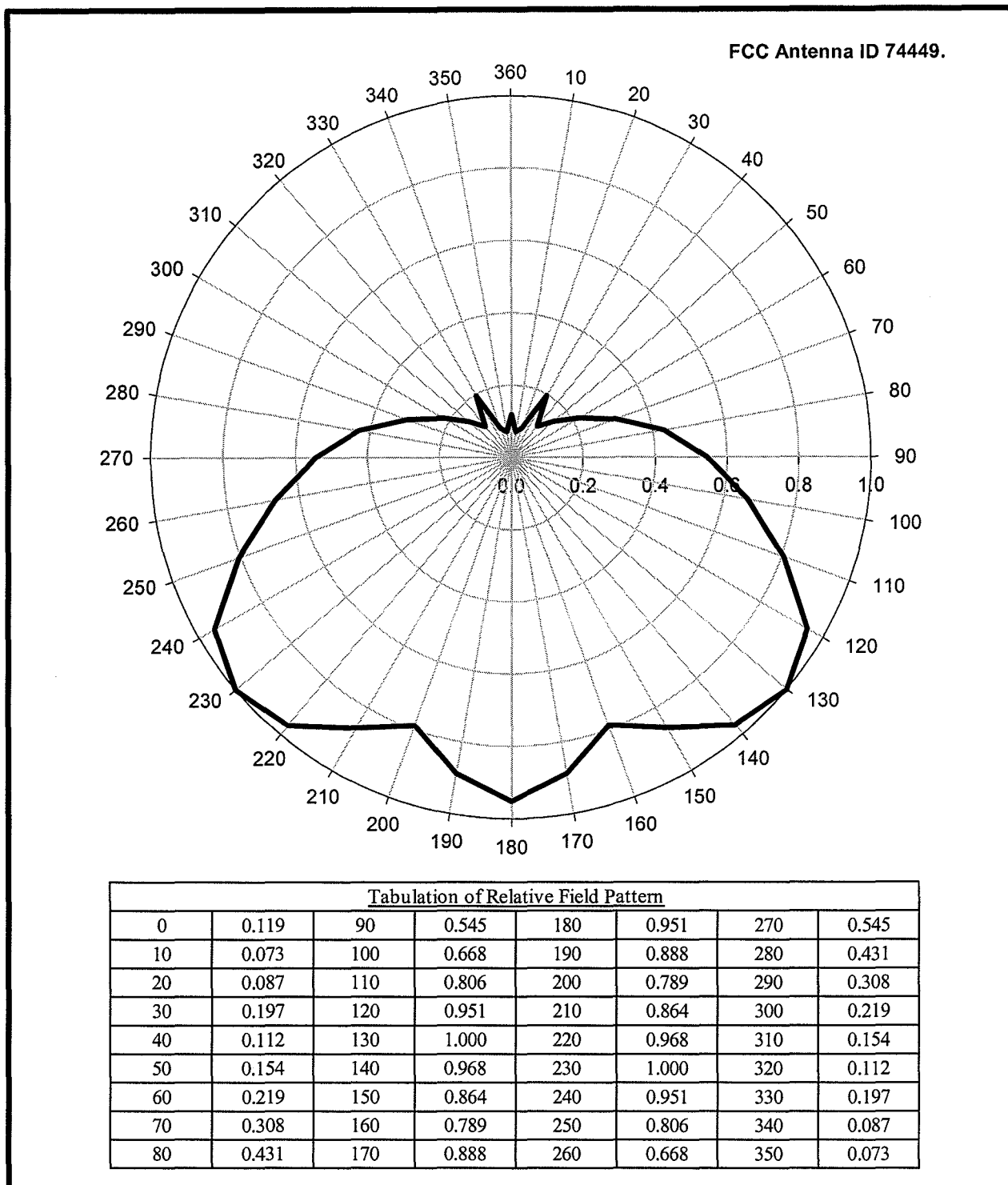


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January 22, 2007

Figure 1

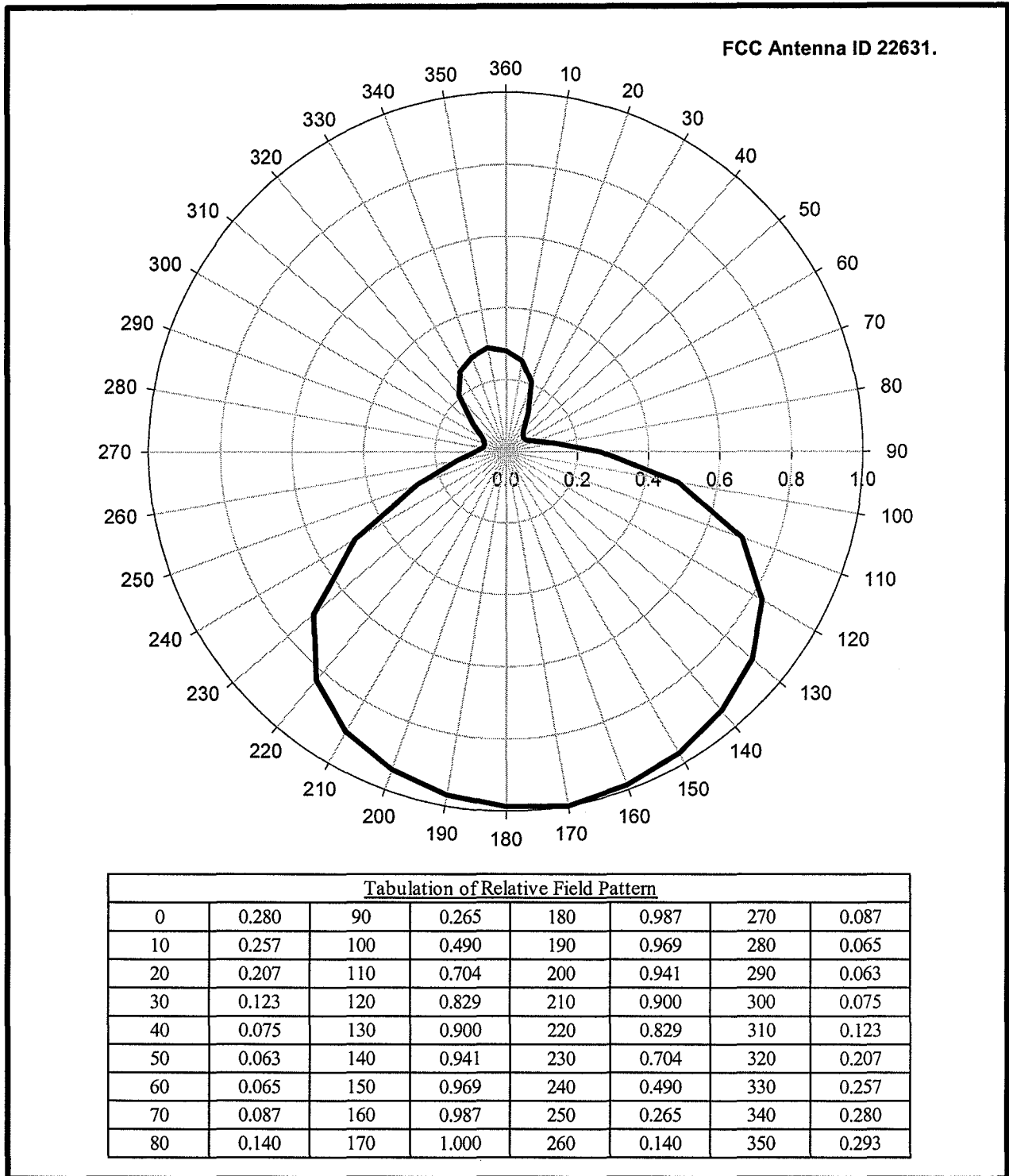


## FCC PROPOSED ALLOTMENT PATTERN FOR KFXF-DT

TANANA VALLEY TELEVISION COMPANY  
FAIRBANKS, ALASKA

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

Figure 2



## PROPOSED REVISED PATTERN FOR KFXF-DT ALLOTMENT

TANANA VALLEY TELEVISION COMPANY  
FAIRBANKS, ALASKA

du Treil, Lundin & Rackley, Inc. Sarasota, Florida